

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
24-mj-789 (ECW)

UNITED STATES OF AMERICA

v.

WAYNE ROBERT LUND

Investigative – Filed Under Seal

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Erinn Tobin, being duly sworn, do hereby state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this Affidavit in support of a Criminal Complaint charging the defendant, WAYNE ROBERT LUND (YOB 1978), with violations of 26 U.S.C. §§ 5845(a), 5845(f), 5861(d), and 5871 (unlawful possession of unregistered firearms, namely, destructive devices), 18 U.S.C. §§ 922(g)(1) and 924(a)(8) (felon in possession of ammunition), and 18 U.S.C. §§ 842(i)(1) and 844(a)(1) (felon in possession of explosives) (collectively, “the SUBJECT OFFENSES”).

2. I am a Special Agent of the Federal Bureau of Investigation (“FBI”), and I have been employed by the FBI since December of 2021. Since October of 2022, I have been assigned to the Joint Terrorism Task Force (the “JTTF”) of the FBI’s Minneapolis Division. In this capacity, I investigate, among other things, criminal cases relating to domestic terrorism, such as allegations of unlawful possession of firearms and destructive devices. In addition to my on-the-job experience, the FBI has provided me with extensive training in domestic terrorism and the techniques used to investigate allegations of domestic terrorism.

3. Your Affiant and other federal and local law enforcement agents and officers are currently conducting an ongoing criminal investigation into possible domestic violence extremism/domestic terrorism involving unlawful possession of ammunition, explosives, and destructive devices.¹

4. The facts set forth in this Affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, my review of documents and computer records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This Affidavit is intended to show only that there is sufficient probable cause to support the charges in the Criminal Complaint and for the requested arrest warrant and does not set forth all of my or the government's knowledge about this matter.

5. Based on my training and experience and the totality of the facts and circumstances set forth in this Affidavit, there is probable cause to believe that WAYNE ROBERT LUND has committed the SUBJECT OFFENSES.

FACTS CONSTITUTING PROBABLE CAUSE

Traffic Stop and State Search Warrants

6. Shortly after 2:00 am on November 2, 2024, an Oak Park Heights Police Officer conducted a routine traffic stop of a 2008 black Chevrolet Trailblazer, with

¹ Under Title 26, Section 5845, a "destructive device" is considered a "firearm" under the National Firearms Act, and is further defined in part as "any explosive, incendiary . . . (A) bomb . . . or (F) similar device." 26 U.S.C. § 5845(a), (f).

Minnesota plates DMY962, (hereinafter, the VEHICLE). At the time of the stop, the VEHICLE was headed westbound on Highway 36 from the direction of Wisconsin, within two to three miles of the Wisconsin borderline. Upon running the VEHICLE's plates, the Officer learned that the VEHICLE's registration had expired in August 2023 and that the registered owner, LUND, had a revoked driver's license. The Officer made contact with the driver and sole occupant, LUND, who was unable to provide a driver's license or proof of insurance. LUND told the Officer that he was homeless and currently staying at the Asteria Inn in Stillwater, MN. The Officer ran a driving-record check for LUND and it returned two prior convictions for lack of insurance. The Officer arrested LUND for gross misdemeanor insurance violation.

7. Prior to towing the VEHICLE, Officers conducted a lawful inventory search of LUND's VEHICLE, and they located in the back seat several small CO2 cartridges with orange taped wicks or fuses coming out of them in a military style pouch attached to a belt, and one approximate eight-inch PVC pipe in the rear trunk



area that had caps screwed in on both ends. The Officers believed the items to be explosives of some kind, so they left them where they were located in the VEHICLE. When asked what the items were, LUND told Officers that they were devices to launch his rockets, and he described various components and concepts for propelling rockets. Police

Officers secured the VEHICLE, took photos of the CO2 cartridges and the PVC pipe

devices, had the VEHICLE towed to an impound lot, and transported LUND to the Washington County Jail for booking and processing.

8. Officers later contacted the Saint Paul Bomb Squad and provided them with photos of the suspected explosives located in the VEHICLE. A Saint Paul Bomb Squad Officer identified the CO2 cartridges from the photos as suspected "cricket" bombs. I know, based on training and experience, that "crickets" is an informal term used by law enforcement to describe destructive devices constructed by packing explosive material into CO2 canisters. As set forth more fully below, the suspected devices possessed by LUND present all the same characteristics.

9. Saint Paul Bomb Squad officers responded to the impound lot to properly and safely handle, remove, and render safe the suspected explosive devices from the VEHICLE, and local officers and firefighters evacuated nearby businesses and residences in the immediate area of the impound lot. Other Officers responded to the Asteria Inn to secure the room and evacuate the area in case there were explosive devices in LUND's hotel room. In the interim, police began applying for state search warrants for the VEHICLE and LUND's hotel room at the Asteria Inn. LUND had told Officers that he was not certain if there were any explosive materials in his hotel room.

10. Saint Paul Bomb Squad officers removed seven suspected CO2 cricket bombs and the PVC pipe device from the VEHICLE. The Saint Paul Bomb Squad later determined that the cricket bombs and the PVC pipe device contained black-colored powder, which ignited when tested and was deemed energetic, i.e., explosive.

(A photo of one suspected CO2 cricket bomb after it was rendered safe is depicted below). The Bomb Squad also discovered that one end of the PVC pipe device had a



small hole drilled into it and had the possible remnants of a fuse, which they suspected may have been previously lit but failed to detonate the PVC pipe device. The remains and contents of the seven suspected CO2 cricket bombs and the PVC pipe device were later

shipped to the FBI Lab in Quantico, Virginia, for forensic analysis and testing.

11. Once the VEHICLE was rendered safe by the Bomb Squad by removing the suspected cricket bombs and the PVC pipe device, Officers executed the state search warrant on the VEHICLE. During search of the VEHICLE, Officers discovered the following:

- a. A binder containing "American National" paperwork
- b. A Gateway laptop
- c. Camouflage clothing

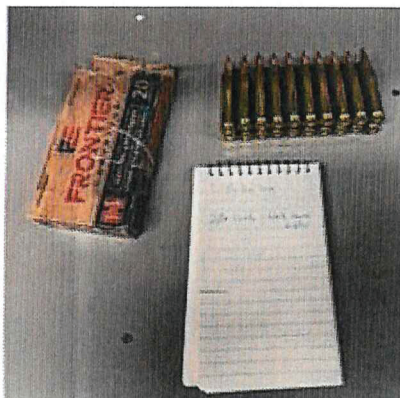
12. The Saint Paul Bomb Squad then responded to LUND's room at the Asteria Inn, in Stillwater, MN. Prior to their arrival, Officers had secured the room and conducted a protective sweep of the room. During the sweep, Officers observed in plain view electronic devices, jumper cables, and military-style clothing.

13. During the search of LUND's hotel room under the state-issued search warrant, Officers discovered the following:

- a. Multiple documents related to American Nationals and the Minnesota State Assembly (i.e., sovereign citizen movement);
- b. 5 CO2 cartridges, similar to the those used for the suspected cricket bombs that were found with inserted wicks in LUND's VEHICLE;
- c. 5 shotgun primers;
- d. 18 electronic devices and media, including multiple cellphones, a laptop, tablets, hard drives, and SD cards;
- e. A three-ring binder titled "List of Pyro Chemicals and Terms," with several terms highlighted including, among others, detonate, flash powder, black powder, delay fuse, and classes of explosives;
- f. A locked personal safe. The safe was x-rayed by the Saint Paul Bomb Squad to ensure it was not explosive or booby-trapped, and it appeared to contain multiple rounds of ammunition. Upon obtaining an additional search warrant to search the safe, police officers discovered a total of 804 rounds of ammunition (*some of which are depicted in photographs below*):
 - i. 3 rifle magazines filled with 81 rounds total of high-velocity Remington .223-caliber LC and LC 21.
 - ii. 4 rifle magazines filled with 116 rounds of high-velocity Remington .223-caliber Barnaul and LC.
 - iii. A box with 49 rounds of Federal .22-caliber Rim Fire, 4 rounds of Remington .22-caliber Hornet, 3 rounds of miscellaneous .22-caliber Hornet, and 4 rounds of Remington .223-caliber LC.
 - iv. A box with 12 rounds of VPT 40-44, 1 round of RP .308-caliber, 3 rounds of Remington 8mm-caliber, and 1 round RA .30-caliber 18.
 - v. 172 rounds of Wolf high-velocity 7.62x39 caliber.²
 - vi. 200 rounds of Federal high-velocity .223-caliber REM LC.
 - vii. 138 rounds of Winchester high-velocity .223-caliber LC 21.
 - viii. 20 rounds of Frontier high-velocity .223-caliber REM LC.

² I know, based on training and experience, that 7.62x39-caliber Wolf is a high-velocity rifle ammunition commonly employed in AK-47 Russian assault rifles and Soviet semi-automatic rifles.

- g. A Minnesota ID for LUND and several traffic citations issued to LUND while driving his VEHICLE;
- h. An airsoft grenade;
- i. A small quantity of white crystal substance, suspected to be methamphetamine; and
- j. A DD214 Military Form indicating LUND served in the National Guard under a food-service job specialty.



14. Based on my training and experience, I know that 5.56/.223 and 7.62 caliber rounds are high-velocity rifle ammunition capable of penetrating standard body armor.

15. On November 14, 2024, Your Affiant consulted with an ATF Special Agent trained in determining interstate nexus. ATF Special Agent Joshua Szondy examined and counted all 804 rounds of ammunition seized from LUND's hotel room. Special Agent Szondy made a preliminary determination that 555 rounds of the ammunition seized were not manufactured in Minnesota, and therefore traveled in or affected interstate commerce before being possessed by LUND in the District of Minnesota.

16. On November 11, 2024, ATF SA Szondy requested a record search with the National Firearm Registration and Transfer Record (NFRTR) for LUND. A Firearms and Explosives Specialist with ATF's NFA Division Government Support Branch conducted the search and provided a report showing that LUND does not have any destructive devices registered with the NFRTR, as is required by the National Firearms Act under Title 26.

Presumptive testing of the devices

17. Presumptive testing conducted by Saint Paul Bomb Squad indicated that both the suspected CO2 cricket bombs and the PVC pipe device contained energetic material, i.e., explosive material.

18. On November 7, 2024, FBI Special Agent Bomb Technicians (SABTs) took custody of the seven suspected CO2 cricket bombs and the PVC pipe device from

the Saint Paul Bomb Squad. FBI SABTs also confirmed energetic material was present in all eight items. Additionally, the seven suspected cricket bombs were deemed to have all the characteristics of destructive devices. I know, based on my training and experience, that when energetic material is confined in a container, such as a CO2 cartridge, it creates an overpressure effect when ignited, causing all the blast pressure from inside the container to be forced out³.

19. The SABTs also noted that one end of the PVC pipe device was noticeably heavier than the other. An x-ray of the PVC pipe device revealed a dense material in the end cap that could be similar to metal. Due to safety concerns regarding this unidentified dense material, SABTs were required to conduct additional render-safe operations, that resulted in reduction of the unidentified material. After the render-safe operations, Your Affiant observed the contents of the PVC pipe device and noted that the PVC pipe device contained a black-colored powder and shards of a material that resembled broken glass. Given the quantity of the energetic material remaining within the PVC pipe device, SABTs believe that it may qualify as an incendiary device.⁴

20. FBI SABTs coordinated shipment of all eight devices to the FBI forensic laboratory in Quantico, Virginia, for further forensic analysis and qualification.

³ Notably, the improvised explosive devices utilized in the Boston Marathon bombing leveraged this principle to increase the lethality of the devices; the bombers confined energetic powder in well-confined pressure cookers to amplify the effects of the blast.

⁴ Your Affiant notes, however, that the NFA under Title 26 nonetheless defines a “destructive device” to include “any . . . incendiary . . . bomb, . . . or . . . similar device,” under 26 U.S.C. § 5845(f).

Law enforcement Mirandized interviews of LUND

21. On November 2, 2024, Oak Park Heights Police Investigator David Wynia conducted a video- and audio-recorded custodial interview of LUND at Washington County Jail. Your Affiant has reviewed the audio recording. LUND was read his Miranda rights and stated that he understood his rights and agreed to speak to Investigator Wynia. In summary, LUND provided the following information:

- The suspected CO2 cricket bomb devices found in LUND's VEHICLE are purportedly "rocket motors" or "rocket engines." The PVC pipe is a "test tube" and LUND uses the pipe to help stand the rockets he launches upright. LUND claimed he uses the CO2 devices to propel his hobby rockets. They are like the Estes Rockets you can purchase, except LUND's are bigger.
- When asked if LUND has ever heard the term "crickets" to describe the CO2 devices that LUND is calling "engines," LUND said he has never heard the term cricket and asked Investigator Wynia what the term means. LUND claimed the CO2 devices do not explode, but only "shoots flame out the back-for velocity," and that "we've been experimenting,"⁵ but he denied that he designed the devices to be a "destruction device."⁶
- Inv. Wynia asked LUND who he is referring to when LUND says "we." LUND said he is talking about LUND and his friend, Known Person 1 ("KP-1"). KP-1 lives in Houlton, WI. LUND and KP-1 make their own black powder out of potassium and put it inside of the metal CO2 cartridges. They purchase the wicks from firework stands.
- When asked about the PVC pipe, LUND said that he shoots rockets out of the tube. Inv. Wynia asked how that is possible if both ends of the PVC pipe are capped. LUND (non-responsively) said that one of the caps is from a second PVC pipe, which "burnt up" the last time he used it.

⁵ Throughout his interview, LUND would often say "we" when referring to acts or things done in response to the questions.

⁶ Your Affiant notes that the SABTs findings, that the seven suspected CO2 cricket bombs met all the characteristics of destructive devices and that they, along with the PVC pipe device, all contained energetic material, contradicts LUND's assertions that the CO2 canisters merely shot out flames, because this claim is not consistent with confinement of energetic material, which will explode when ignited, as well as his claims regarding the PVC pipe.

- LUND learned about explosives from his time in the military. LUND stated he served 8 years active duty from 2001-2008 as a light wheel mechanic; LUND claimed he was detached out of 151st in Anoka and 834th Brigade in St. Paul⁷.
- When asked about the binder found in LUND's hotel room about chemicals and explosives, LUND said he is just interested in explosives, and it is related to his "hobby."
- LUND used to live and work at 50 Houlton School Circle, Houlton WI, until he was evicted by his landlord (hereinafter, LANDLORD) in February of 2024. LUND used to work for his LANDLORD's towing business at the same address. In February 2024, the LANDLORD evicted LUND and supposedly got him arrested. LUND and his LANDLORD are in litigation over the eviction and because his LANDLORD has not returned LUND's personal property.
- After getting evicted, LUND started working for a different towing company in Houlton, WI. LUND parked his VEHICLE at the towing company's property until about a month ago, because it was having mechanical issues. After his VEHICLE got fixed, LUND picked it up and has had it since. The CO2 devices and the PVC pipe have been in his VEHICLE the entire time LUND has been driving it during the last month.
- LUND had no intention of hurting anyone or anyone's property.
- LUND does not research anything about his rockets online. LUND learns by experimenting on his own.
- LUND last shot off the rockets about a year ago. LUND used to shoot off the rockets using the CO2 devices in a field in Houlton, WI, which belongs to a friend of KP-1's. LUND does not know the name of KP-1's friend.
- The shotgun primers found in LUND's hotel room are used for a "trip alarm." The trip alarms are used for when someone tries to steal your package, or it can be rigged to go off and alert you if an animal is trying to come into your camp.
- LUND declared, "I'm a National." When asked to elaborate, LUND explained that he is an "American National," which means he is covered under the "law of the land" instead of the "law of the seed." LUND explained that all 50 states are establishing state assemblies. North Carolina has recently established a family global bank to control American National

⁷ LUND's claim is inconsistent with the DD-214 form found in LUND's hotel room, which indicated he served within a food-service job specialty.

currency, called American Federate Dollars (AFD). It has taken LUND five or six years to understand everything.⁸

- When asked what is in his safe at the hotel, LUND first responded that there are just coins and some old magazines in it. Inv. Wynia asked if there is anything else in the safe and LUND replied, "that's about it." Inv. Wynia asked directly if there is any ammunition in the safe and LUND then responded, "There's ammunition in there."
- When Inv. Wynia informed LUND that he is prohibited from possessing ammunition, LUND replied, "I don't have any guns." Inv. Wynia then reiterated that LUND is also prohibited from possessing ammunition as a felon, and LUND replied, "Oh, no. there's a little difference to that. There's a difference between the public and the private. I did my certificate of assumed name, which separates me from the public and private side of things," and that he is not doing anything for "mischievous reasons."⁹
- Inv. Wynia asked LUND if the white crystal substance in the small plastic baggie found in his hotel room was meth. LUND replied, "It was. Yup. Unfortunately." When asked when he last used meth, LUND replied, "three or four days ago."

22. On November 5, 2024, Inv. Wynia and St. Croix County Sheriff's Investigator Nick Krueger conducted a second recorded custodial interview of LUND at Washington County Jail. LUND was again advised of his Miranda rights, stated that he understood his rights, and agreed to speak with the officers. In summary, LUND provided the following information:

- LUND built and tested the CO2 devices at 50 Houlton School Circle, Houlton, WI;
- LUND filled the CO2 cartridges with 1 to 2 grams of combustible material;

⁸ Your Affiant knows, based on training and experience, that these types of assertions and claims are commonly associated with so-called self-proclaimed sovereign citizens, who believe they are not subject to any federal laws or jurisdiction within the United States.

⁹ Based on training and experience, Your Affiant interpreted this exchange as LUND saying that because he is a sovereign citizen, or "private," he is exempt from criminal law if he is not planning to harm anyone.

- LUND's friend KP-1 was present when LUND built and tested his engines; LUND's friends, KP-1 and another named person, can verify what LUND is saying;
- LUND used to live at 50 Houlton School Circle, Houlton WI, until he was evicted by his LANDLORD in February of 2024;
- LUND used to work for the LANDLORD's towing business out of the 50 Houlton School Circle address;
- When asked about the ammunition in his hotel room safe, LUND said he obtained the ammunition when it was legal for him to possess it, and he intends to sell it;
- When asked about the shotgun primers in his hotel room, LUND said they could be used in mailboxes to ward off unwanted persons, or trip wires on property to keep animals away or notify you of unwanted persons.

Law enforcement interviews of LANDLORD

23. On November 6, 2024, SCSO Inv. Krueger interviewed LUND's prior LANDLORD, over the phone. In summary, the LANDLORD provided the following information:

- LANDLORD lives in Minnesota but owns the property at 50 Houlton School Circle, Houlton, WI. The property includes a mechanic shop and LANDLORD runs a towing business at this location;
- LUND used to live at 50 Houlton School Circle, Houlton, WI;
- LANDLORD evicted LUND, and they have an ongoing civil dispute;
- LUND had a large freezer chest that he used as a property storage container; The freezer was never plugged in, and LUND kept it locked; LUND told LANDLORD that LUND kept his personal property in the freezer chest. LANDLORD did not recall seeing inside the freezer chest.
- When LANDLORD evicted LUND, the LANDLORD removed all of LUND's personal property and placed it outside of the building for LUND to collect. LUND came and got his property, including the freezer chest.
- LANDLORD believes a neighbor helped LUND move the freezer chest from 50 Houlton School Circle to a neighbor's property.

- When LUND was evicted, LUND moved in with another individual, but LANDLORD did not know that person's last name (hereinafter "OP-1"); After staying with OP-1 for a bit, LUND moved to KP-1's house, and then later moved into the hotel in Stillwater.
- On November 5, 2024, LANDLORD was at his shop at 50 Houlton School Circle, when OP-1 approached LANDLORD and told LANDLORD that LUND had been arrested for possessing explosive devices; OP-1 told LANDLORD that LUND was at OP-1's house in Wisconsin just before LUND was arrested on November 2, 2024.

24. As part of the investigation, your Affiant has also learned, by reviewing prior law enforcement reports, that LUND has had several law enforcement contacts at the 50 Houlton School Circle address, and that he was arrested for alleged criminal violations on some of those occasions.

25. For example, on February 26, 2024, St. Croix County Sheriff's Office (SCSO) responded to a request from the LANDLORD of 50 Houlton School Circle, in Houlton, WI, to assist with the eviction of LUND from the property. The LANDLORD reported that LUND recently started moving property into the business office space attached to the shed and started living there. LANDLORD reported that LUND was told he could not live on the business property, but LUND refused to leave and told the LANDLORD not to go into the business office. The LANDLORD told Deputies that he observed a makeshift gun on the desk of the office and that LUND was wearing a bulletproof vest under his camouflage jacket. SCSO Deputies attempted to contact LUND, but he barricaded himself in the business office. SCSO Deputies set a perimeter and LUND eventually departed the building, at which point he was taken into custody for unlawful possession of body armor and a stun gun.

26. On March 12, 2024, SCSO was called to standby at the 50 Houlton School Circle address, while LUND retrieved his property post-eviction. SCSO bodycam footage from this interaction showed LUND telling the Deputy he was there to pick up his property, specifically a large, white freezer chest and trailer. LUND told the Deputy that a “neighbor” was going to help him move the freezer chest onto the neighbor’s property. Shortly after, a couple of people arrived to assist LUND. The group moved the freezer chest onto LUND’s trailer. SCSO Inv. Krueger advised Your Affiant that the neighbor who assisted LUND with loading of the freezer chest was OP-1.

Execution of Federal Search Warrant of LUND’s freezer chest

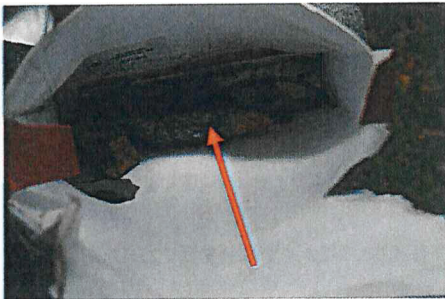
27. On November 6, 2024, SCSO Deputy Krueger conducted a spot check at OP-1’s residence. SCSO Deputy Krueger did not observe the LUND’s freezer chest at the residence. While driving on Main Street, however, Dep. Krueger observed the LUND’s freezer chest on a trailer at the southeast corner of KP-1’s residence in Houlton, WI. Dep. Krueger recognized the freezer chest as the same large, white freezer chest that LUND and OP-1 originally moved from LANDLORD’s property at 50 Houlton School Circle.

28. On November 13, 2024, Your Affiant obtained a federal search warrant to search LUND’s freezer chest for evidence, fruits, and instrumentalities of the SUBJECT OFFENSES. *See 24-mj-780 (ECW).*

29. On November 14, 2024, Your Affiant and other federal agents and local law enforcement officers executed the search warrant on LUND's freezer chest. Upon breaching the locked freezer chest, law enforcement found:

- a. 1 suspected cricket bomb;
- b. Approximately 117 CO2-style empty metal cartridges;
- c. A 12-inch-long white PVC pipe capped on one end;
- d. Hobby fuse;
- e. A bottle of stump cleaner;
- f. A large plastic container of dark powder labeled "charcoal";
- g. 3 empty glass bottles
- h. a plastic milk jug filled halfway with a dark powder;
- i. a lower receiver for a suspected Sig Sauer pellet gun.

30. On November 14, 2024, presumptive testing conducted by FBI SABTs indicated that the suspected CO2 cricket bomb and the half-filled gallon milk-jug of dark powder both contained energetic material, i.e., explosive material. The SABTs



noted that stump cleaner and charcoal are both precursors to make black powder, which requires potassium nitrate (the main ingredient in stump remover) and charcoal. FBI SABTs noted that the CO2-style empty cartridges, powder, and hobby fuse were all consistent with the seven suspected cricket bombs found in LUND's vehicle.



31. During render safe operations, FBI SABTs confirmed that the suspected CO2 cricket bomb consisted of an expended CO2 cartridge packed with dark powder, a fuse, and orange tape. All of these characteristics are consistent with the seven suspected cricket bomb devices found in LUND's vehicle.

32. During the search, Your Affiant and SCSO Inv. Krueger interviewed the property owner, KP-1, who in summary part told investigators the following: the freezer chest belongs to LUND and KP-1 has no idea what is in it; LUND has always been interested in rockets and taught KP-1 how to make sugar rockets; LUND told KP-1 how to make "boomers" out of CO2 cartridges; KP-1 was not interested in messing with boomers, because he was worried someone might get hurt because of the metal cartridge; LUND was at KP-1's place in Wisconsin the Friday evening right before LUND got arrested until 10pm or 11pm before leaving to head back to his hotel in Stillwater, MN.

LUND's Washington County Jail Calls

33. On November 8, 2024, Your Affiant reviewed jail calls made by LUND from Washington County Jail. On the evening of November 8, 2024, LUND made two phone calls in total, both to KP-1. During the calls, LUND discussed execution of the state search warrant at his hotel and how law enforcement took his property. Specifically, LUND talked about how law enforcement got into his safe and he “had 900 rounds in there.” LUND told KP-1 about his custodial interviews and how he told law enforcement that, “I’m American National. An actual American National, not a fucking sovereign fucking citizen, which is an oxymoron, you know?”

34. On November 8, 2024, Your Affiant reviewed photos of several documents located in LUND’s VEHICLE at the time of his arrest. Several documents included LUND’s signature and testament to belonging to the “Minnesota State Assembly.” Several documents included LUND’s fingerprint and signature, inscribed in red ink. Your Affiant is aware that red ink is an important requirement in the sovereign citizen ideology to designate official documents. One document includes a photo of LUND with printed status, “American State National.”

35. Open-source research of the “Minnesota State Assembly” returns a website advertising, “Reclaim your Status as American State Nationals and American State Citizens and help finish the Reconstruction of our Actual government that was vacated after the civil war.”

36. Through my training and experience, I am aware that the American State Nationals is a group which professes the ideology commonly referred to as the

sovereign citizen movement. American Nationals often reject the label “sovereign citizen” because they see it as an oxymoron—professing autonomy by using the word “sovereign,” while simultaneously associating with a group by referencing “citizen.” American Nationals believe that they can declare themselves sovereign, or private parties, and no longer be subjected to the rules and laws of the U.S. government. This extends to the belief that sovereign citizens or “privates” do not have to obey criminal laws. Your Affiant is aware of several cases in which individuals espousing the sovereign citizen ideology have committed or attempted to commit domestic violent extremism in furtherance of this anti-government ideology.

LUND's criminal history

37. LUND has a criminal history that includes a 2013 felony conviction for terroristic threats, for which he was sentenced to 18 months' imprisonment. According to court documents, on December 15, 2013, LUND got into a dispute with acquaintances, pointing a gun at them and threatened to kill them. LUND also has a 2004 felony DWI conviction, for which he was sentenced to 36 months' imprisonment, and multiple misdemeanor convictions related to traffic violations and public nuisance.

38. LUND is currently in custody at Washington County Jail being charged by criminal complaint on four state charges of prohibited person in possession of ammunition, prohibited person in possession of an explosive or incendiary device, fifth-degree drug possession, and uninsured vehicle owner.

CONCLUSION

39. Based on the totality of facts and circumstances herein, and my training, experience, and knowledge, there is probable cause to believe that LUND has committed violations Title 26, United States Code, Section 5861(d) (unlawful possession of unregistered firearms, namely, destructive devices); Title 18, United States Code, Section 922(g)(1) (felon in possession of ammunition); and Title 18, United States Code, Section 842(i)(1) (felon in possession of explosives).

Respectfully submitted,



Erinn Tobin
Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN before me,
by reliable electronic means via Zoom and email,
pursuant to Fed. R. Crim. P. 41(d)(3), this 15th
day of November, 2024


ELIZABETH COWAN WRIGHT
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA